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RECEIVE 575 SEVENTH STREET NW WASHINGTON, DC 20004 T 202.344.4000 F 202.344.8300 www.Venable.com

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FO MAIL CENTER

December 12, 2014

Lawrence H. Norton

T 202.344.4541 F 202.344.8300 Ihnorton@venablc.com

**VIA HAND DELIVERY** 

Frankie D. Hampton
Paralegal Specialist
Federal Election Commission
Office of General Counsel, CELA Division
999 E Street, N. W.
Washington, DC 20463

Re: MUR #6902 - Designation of Counsel and Request for Extension

Dear Ms. Hampton:

Enclosed please find a Statement of Designation of Counsel in MUR 6902 for respondents, Independence USA PAC and Dianne Gubelli in her official capacity as committee treasurer.

On behalf of respondents, we request a 30-day extension, until January 26, 2015, to submit a written response to the complaint. As I explained in our phone conversation earlier this week, respondents did not receive copies of the complaint until December 11, 2014, when you kindly emailed copies to me. The 15-day statutory period for filing a written response therefore runs until December 26, 2014. We request this 30-day extension to give us sufficient time to investigate the allegations made against respondents and prepare an appropriate response. Moreover, with the upcoming holidays, we anticipate some delays in speaking with witnesses and collecting relevant materials.

Thank you for your consideration of this request. Please do not hesitate to contact me at the above phone number or email address if you have any questions.

Respectfully submitted,

n. Ent

Lawrence H. Norton

Enclosure



# FEDERAL ELECTION COMMISSION 999 E Street, NW Washington, DC 20463

## STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

#### FAX 202-219-3923

MUR # _6	902				
Name of Cour	nsel:Lawrence_H.::Nort	on			
	enable. LLP	•		• • • • • • • • • • • • • • • • • • • •	
Address:	575 7th Street, NW		<i></i>		·
	Washington, DC 20004		<del></del>		· · · · · · · · · · · · · · · · · · ·
Telephone: _	(202) 344-4541	Fax:	(202)	344-8300	<del>::</del>
E-mail: L	HNorton@Venable.com	: 			· · · · · · · · · · · · · · · · · · ·
notifications a Commission.  12/12/201  Date	0/	the Commission  (Respondent/Agent)	and to ac	t on my behalf before	ihe
RESPONDE	(Committee Name/	Company Name/I		Named in Notification	Letter)
Mailing Addre (Please Print)	c/o Diane Gubelli, New York, NY 1002		venue,	15th Floor	
	):			12) 583-6000	
C-111811!	<del></del>		<del></del>	<del></del>	

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation conducted by the Federal Election Commission without the express written consent of the person under investigation.



# FEDERAL ELECTION COMMISSION 999 E Street, NW Washington, DC 20463

## STATEMENT OF DESIGNATION OF COUNSEL

Provide one form for each Respondent/Witness

#### FAX 202-219-3923

MUR # _6902	2			
Name of Counsel	Lawrence H. Nor	ton		
Firm: Vene	ible, LIP	·		
Address:575	7th Street, NW	<del></del>	<u> </u>	
Was	hington, DC 20004		· · · · · · · · · · · · · · · · · · ·	
Telephone:	202) 344-4541	Fax:	(202) 344-8	3300
B-mail: LHNo	orton@Venable.com	· · · · · · · · · · · · · · · · · · ·	· ·	
	other communications from	n the Commission a	nd to act on my	<b>T<u>reasurex</u></b> Title
RESPONDENT	Committee Name	her official Company Name/Inc	capacity Iividual Named	as Treasurer in Notification Letter)
Mailing Address: (Pleasé Print)	909 Third Avenue			
			V): <u>(212) 58</u>	3-6000
E-mail:		<del></del>		

This form relates to a Federal Election Commission matter that is subject to the confidentiality provisions of 52 U.S.C. § 30109(a)(12)(A). This section prohibits making public any notification or investigation-conducted by the Federal Election Commission without the express written consent of the person under investigation.